

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

JAMILA HANIFI,)	
)	
Plaintiff,)	
)	Case No. 1:22-cv-293
v.)	(Formerly Case No. GV22001950-00 in
)	Prince William County General District
SARA JANE VAN ROE,)	Court)
)	
Defendant.)	
)	

NOTICE OF REMOVAL

TO: Rhonda Ann Daley
Clerk of the Court
General District Court of Prince William County
9311 Lee Ave.
Manassas, VA 20110
Tel: 703-792-6141

Demetrios C. Pikrallidas
Ryan M. Probasco
PIKRALLIDAS & PROBASCO
10605 Judicial Drive, Building A-4
Fairfax, VA 22030
Tel: 703-267-2600
Fax: 703-273-8046
dp@piklaw.com
ryan@piklaw.com

Counsel for Plaintiff

PLEASE TAKE NOTICE that on March 18, 2022, the United States of America, through undersigned counsel, filed with the Clerk of the United States District Court for the Eastern District of Virginia (Alexandria Division), this notice of the removal of the instant civil action from the General District Court of Prince William County. As grounds for this removal, the

United States provides as follows:

1. Plaintiff Jamila Hanifi filed a warrant in debt against Sara Jane Van Roe, seeking \$50,000 plus pre-judgment interest and \$62 in costs for “personal injuries, lost wages, mental anguish, and all other damages recoverable in law and equity caused by Defendant’s negligence in a motor vehicle crash on March 6, 2020.” Exhibit A (Warrant in Debt). A copy of all process, pleadings, and orders served upon Van Roe is attached to this Notice of Removal as Exhibit A.

2. Plaintiff filed her warrant in debt in General District Court in Prince William County. Exhibit A.¹ A hearing on the matter is currently set for May 12, 2022 at 11:00am. No other hearings have been scheduled, and no trial has yet been had in that action.

3. Pursuant to 28 U.S.C. § 2679(d), the United States Attorney for the Eastern District of Virginia has certified that Defendant was acting within the scope of her employment as an employee of the federal government at the time of the events giving rise to Plaintiff’s Claim. Exhibit B (Certification). Accordingly, the instant action is properly removable pursuant to 28 U.S.C. § 2679(d)(2), which provides that

[u]pon certification by the Attorney General that the defendant employee was acting within the scope of his office or employment at the time of the incident out of which the claim arose, any civil action or proceeding commenced upon such claim in a State court shall be removed without bond at any time before trial by the Attorney General to the district court of the United States for the district and division embracing the place in which the action or proceeding is pending.

28 U.S.C. § 2679(d)(2). There can be little doubt that the Prince William County General District Court lies within this Court’s jurisdiction. *Id.* § 127(a).

¹ Van Roe was served twice with a copy of the Warrant in Debt. The second copy was unchanged save for the addition of a case number, GV22001950-00.

4. A copy of this Notice of Removal is being filed with the Prince William County Circuit Court pursuant to 28 U.S.C. § 1446(d).

Dated: March 18, 2022

Respectfully submitted,

JESSICA D. ABER
UNITED STATES ATTORNEY

By: /s/
MEGHAN LOFTUS
Assistant United States Attorney
Office of the United States Attorney
Justin W. Williams U.S. Attorney's Building
2100 Jamieson Avenue
Alexandria, Virginia 22314
Tel: (703) 299-3757
Fax: (703) 299-3983
meghan.loftus@usdoj.gov

Counsel for Defendant